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6 IN THE UNITED STATES DISTRICT COURT
7 FOR THE NORTHERN DISTRICT OF CALIFORNIA
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9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

12 ANGELO DELAROSA,

13 Defendant.

) No. CR 11-00778 RS

) [PROPOSED] STIPULATED
) ORDER CONTINUING CHANGE
) OF PLEA

) **Current Hearing Date:** Tuesday,
) March 20, 2012 at 2:30 p.m.

) **Proposed Hearing Date:** Tuesday,
) April 10, 2012 at 2:30 p.m.

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17 The parties in the above-entitled case have arrived at a tentative disposition and are
18 awaiting final approval of the written plea agreement.

19 The defense accordingly requests that the change of plea hearing now scheduled for
20 Tuesday, March 20, 2012 be vacated, and that the matter be added to the Court's calendar for
21 Tuesday, April 10, 2012 at 2:30 p.m. for change of plea.

22 The defense also requests that the time between March 20, 2012 and April 10, 2012 be
23 excluded under the Speedy Trial Act. Mr. Delarosa is currently housed in Santa Rita Jail,
24 where he is receiving treatment from mental health professionals. Because of these unique
25 aspects of this case, additional time is required for defense counsel to review any written plea
26 agreement with the defendant and to prepare the defendant for entry of a plea of guilt. The

1 defense suggests that, given these circumstances, exclusion of time is both necessary and
2 appropriate for the effective preparation of defense counsel.

3 The government has no objection to the requested continuance and joins in the proposed
4 exclusion of time.

5 Therefore, for good cause shown the appearance now scheduled for Tuesday, March 20,
6 2012, is vacated. The matter shall be added to this Court's calender on Tuesday, April 10,
7 2012 at 2:30 p.m. for change of plea. Time shall be excluded under the Speedy Trial Act
8 between March 20, 2012 and April 10, 2012 to permit for the effective preparation of
9 counsel.

10 IT IS SO ORDERED.

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12 3/20/12

13 DATED



RICHARD SEEBORG
United States District Court Judge

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15 IT IS SO STIPULATED.

16 March 19, 2012

17 DATED

/s

MELINDA HAAG
United States Attorney
Northern District of California
PHILLIP KEARNEY
Assistant United States Attorney

21
22 March 19, 2012

23 DATED

/s

GEOFFREY A. HANSEN
Federal Public Defender
Northern District of California
STEVEN G. KALAR
Assistant Federal Public Defender